

Appl. No. : 10/672,906
Filed : September 25, 2003

REMARKS

In response to the Office Action mailed July 11, 2005, Applicant has amended the application as above. No new matter is added by the amendments as discussed below. Applicant respectfully requests the entry of the amendments and reconsideration of the application in view of the amendments and the remarks set forth below.

Discussion of Claim Amendments

Claims 7-20, withdrawn from consideration, have been cancelled, without prejudice. Claim 1 has been amended. Upon the entry of the amendments, Claims 1-6 are pending in this application. The amendments to Claim 1 are supported by the specification at paragraph [0052] and Figure 3B, for example. Thus, no new matter is added by the amendments. Applicant respectfully requests the entry of the amendments.

Discussion of Claim Rejections Under 35 U.S.C. § 103(a)

The Examiner has rejected Claims 1-6 under 35 U.S.C. § 103 (a) as being unpatentable over Applicant's admitted prior art (AAPA) in view of Tsubo (U.S. Patent No. 6,831,295). Applicant respectfully submits that all pending claims are allowable over the cited prior art as discussed below.

Standard of Prima facie Obviousness

In order to provide a *prima facie* showing of obviousness under 35 U.S.C. § 103, all the claim limitations must be taught or suggested by the prior art. *See, e.g., In re Royka*, 490 F. 2d 981, 180 U.S.P.Q. 580 (CCPA 1974); MPEP 2143.03.

Discussion of Patentability of Independent Claim 1

Independent Claim 1, as amended, recites, among other things, that each pixel electrode is divided into a plurality of sub pixel electrodes, and at least a portion of each metal line is located between adjacent sub pixel electrodes. Applicant respectfully submits that the above-indicated features of the claimed invention are neither taught nor suggested by the cited prior art.

1. Neither AAPA nor Tsubo teaches or suggests “each pixel electrode is divided into a plurality of sub pixel electrodes, and at least a portion of each metal line is located between adjacent sub pixel electrodes” recited in amended Claim 1

AAPA does not disclose the above-recited features of the claimed invention. AAPA discloses a single pixel electrode (308) in each pixel region. *See Figures 2A-2C of this application.* Since AAPA teaches only one pixel electrode (308) in each pixel region, AAPA cannot, and does not, teach “each pixel electrode is divided into *a plurality of sub pixel electrodes*, and at least a portion of each metal line is located *between adjacent sub pixel electrodes*” recited in amended Claim 1. Furthermore, AAPA does not teach “a plurality of metal lines located on said first substrate and expanded from said plurality of common electrode lines” recited in Claim 1. The Examiner has acknowledged as such in this Office Action. Thus, Applicant respectfully submits that AAPA does not teach or suggest all of the features of the claimed invention.

Tsubo does not teach or suggest the above-indicated features recited in amended Claim 1. Tsubo discloses a single pixel electrode (13) in each pixel region. *See Figures 5, 6A-6C, 7-9, 10A-10B and 11-14 of Tsubo.* Again, since Tsubo teaches only one pixel electrode (13) in each pixel region, the Tsubo reference cannot, and does not, teach “each pixel electrode is divided into *a plurality of sub pixel electrodes*, and at least a portion of each metal line is located *between adjacent sub pixel electrodes*” recited in amended Claim 1. *See Figures 11 and 13 of Tsubo.* Thus, Applicant respectfully submits that Tsubo does not teach or suggest all of the features of the claimed invention.

2. There is No Motivation or Suggestion to Combine AAPA and Tsubo to Arrive at the Claimed Invention

The main purpose of Tsubo is to reduce the feed-through voltage so as to suppress the variance in the brightness among the pixels within the display panel. *See column 4, lines 41-44.* In contrast, one embodiment of the claimed invention is to provide a pixel structure for which a given period at the start of operation of a liquid crystal display device is not necessary and to allow an optically compensated bend (OCB) cell to transform from a splay orientation to a bend orientation state in a short period. *See paragraphs [0013] and [0014], for example.* Thus, a

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skilled person in the AAPA would not have been motivated to look at the Tsubo reference since the object of Tsubo is quite different from that of one embodiment of the claimed invention.

Furthermore, even if the AAPA and Tsubo were combined, the combined device would not teach the claimed invention since neither of the references teaches the above-recited features of the claimed invention.

3. Summary

In view of the above, Applicant respectfully submits that AAPA and Tsubo, alone or in combination, do not teach or suggest all of the features of amended Claim 1. Furthermore, there is no motivation or suggestion to combine the two references to arrive at the claimed invention. Thus, no *prima facie* of obviousness has been established. Therefore, Applicant respectfully submits that independent Claim 1 is allowable over AAPA and Tsubo.

Discussion of Patentability of Dependent Claims

Claims 2-6 depend from base Claim 1, and further define additional technical features of the present invention. In view of the patentability of their base claim, and in further view of their additional technical features, Applicant respectfully submits that the dependent claims are patentable over the prior art of record.

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CONCLUSION

In view of Applicant's amendments to the claims and the foregoing remarks, it is respectfully submitted that the present application is in condition for allowance. Should the Examiner have any remaining concerns which might prevent the prompt allowance of the application, the Examiner is respectfully invited to contact the undersigned at the telephone number appearing below.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

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By: 

John M. Carson
Registration No. 34,303
Attorney of Record
Customer No. 20,995
(619) 235-8550

1980728
100705